

**Lindsey H. Hughes, OSB #833857**

lhughes@keatingjones.com  
Keating Jones Hughes PC  
200 SW Market St., Suite 900  
Portland, OR 97201-5730  
Phone: (503) 222-9955  
Fax: (503) 796-0699  
Of Attorneys for Defendants Letty Owings Center  
and Central City Concern

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORLTAND DIVISION**

NICOLE MORETTI, as Personal  
Representative of the Estate of SAYLOR  
MORETTI, deceased,

Plaintiff,

v.

LETTY OWINGS CENTER, CENTRAL  
CITY CONCERN and the UNITED  
STATES acting through the DEPARTMENT  
OF HEALTH and HUMAN SERVICES,

Defendants.

Case No. 3:21-cv-1525

**DEFENDANTS' UNOPPOSED JOINT  
MOTION TO EXTEND ANSWER DATE**

By Letty Owings Center and Central City  
Concern

**CERTIFICATE OF COMPLIANCE WITH LR 7-1**

Counsel for Defendants Letty Owings Center and Central City Concern, ("defendants") has conferred with Plaintiff's counsel, Karl G. Anuta, and counsel for all other named parties. This motion is unopposed and jointly presented by all defendants.

**MOTION**

Defendants Letty Owings Center and Central City Concern Recovery Center move the court on behalf of all defendants for an order extending the deadline for responding to the

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Doc No. 1807029

**KEATING JONES HUGHES P.C.**  
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Portland, Oregon 97201-5730  
(503) 222-9955

Amended Complaint by 30 days. Defendant United States of America has recently concluded its analysis whether it is a proper defendant and whether FSHCAA applies to defendants Letty Owings Center and Central City Concern. The United States has recently advised defendants Letty Owings Center and Central City Concern of its determination of these complex issues. Now that defendants Letty Owings Center and Central City Concern have that information, they are finally able to formulate the response needed as a first appearance to ensure their position concerning application of FSHCAA and its protections is heard.

Defendants' responses to the amended complaint are currently due on May 23, 2022. The proposed appearance deadline is June 22, 2022. Other scheduling deadlines should be reset after responses are filed and a Rule 16(b) conference is held. This request is made in good faith and not for the purposes of delay.

### **CONCLUSION**

Defendants request that their responses to the amended complaint be due on June 22, 2022.

DATED this 19<sup>th</sup> day of May, 2022.

Respectfully submitted,  
KEATING JONES HUGHES, P.C.

*s/Lindsey H. Hughes*  
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Lindsey H. Hughes, OSB No. 833857  
503-222-9955  
Attorneys for Defendants Letty Owings Center and Central  
City Concern

*s/Michael Jeter*  
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Michael Jeter  
Assistant U.S. Attorney  
Attorneys for Defendant United States of America

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**CERTIFICATE OF SERVICE**

I hereby certify that I served the foregoing **DEFENDANTS' UNOPPOSED JOINT MOTION TO EXTEND ANSWER DATE** on the following:

Karl Anuta  
Law Office of Karl G. Anuta, P.C.  
735 SW First Ave, 2<sup>nd</sup> Floor  
Portland, Oregon 97204  
Phone: (503) 827-0320  
Email: [kga@integra.net](mailto:kga@integra.net)  
Of Attorneys for Plaintiff

Scott Erik Asphaug  
U.S. Attorney  
District of Oregon  
Michael Jeter  
Assistant U.S. Attorney  
1000 SW Third Avenue, Suite 600  
Portland, Oregon 97204-2902  
Phone: (503) 727-1025  
Email: [michael.jeter@usdoj.gov](mailto:michael.jeter@usdoj.gov)  
Attorneys for Defendant United States of America

by electronically mailed notice from the court to above attorneys on said day.

DATED this 19<sup>th</sup> day of May, 2022.

KEATING JONES HUGHES, P.C.

*s/Lindsey H. Hughes*

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Lindsey H. Hughes, OSB No. 833857  
[lhughes@keatingjones.com](mailto:lhughes@keatingjones.com), FAX 503-796-0699  
Of Attorneys for Defendants Letty Owings Center and  
Central City Concern

Trial Attorney: Lindsey H. Hughes, OSB No. 833857